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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WISCONSIN

U.S. EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION,

Plaintiff,

vs. Case No. 22-cv-00039
VERONA AREA SCHOOL DISTRICT,
Defendant.

VIRTUAL DEPOSITION OF: STACY TREMAINE

TAKEN AT: The Witness's Residence

LOCATED AT: [REDACTED]

December 16, 2022

10:00 a.m. to 11:31 a.m.

REPORTED BY: VICKY L. ST. GEORGE, RMR.

Job No. CS5626961

		Page 2	Page 4
1	APPEARANCES		
2	U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION, by		
3	ANN HENRY		
3	ELIZABETH BANASZAK		
4	230 South Dearborn, Suite 2920		
4	Chicago, Illinois 60604		
4	(312) 872-9744		
5	ann.henry@eeoc.gov		
	elizabeth.banaszak@eeoc.gov		
6	Appeared remotely on behalf of the Plaintiff.		
7	AXLEY BRYNELSON, LLP, by		
	LORI M. LUBINSKY		
8	RICH BOLTON		
	2 East Mifflin Street, Suite 200		
9	Madison, Wisconsin 53703		
	800-368-5661		
10	llubinsky@axley.com		
	Appeared remotely on behalf of the Defendant.		
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15	STACY TREMAINE		
16	EXAMINATION BY MS. LUBINSKY	3	
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19	EXHIBITS		
20	NUMBER	DESCRIPTION	PAGE
21	Exhibit 1	Letter Dated 3-23-2020	24
22			
23	REQUESTS - NONE		
24	(Original exhibit attached to original transcript.)		
25	(Original transcript was delivered to Attorney Lubinsky.)		
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1	TRANSCRIPT OF PROCEEDINGS		
2	STACY TREMAINE called as a witness herein,		
3	after having been first duly sworn on oath, was		
4	examined and testified as follows:		
5	EXAMINATION		
6	BY MS. LUBINSKY:		
7	Q. Please state your full name.		
8	A. Stacy Lynn Tremaine.		
9	Q. Spell your last name, please.		
10	A. TREMAINE.		
11	Q. And Stacy, it looks like you might be home today.		
12	Can you just tell us generally physically where you		
13	are?		
14	A. I am at my apartment in [REDACTED]		
15	Q. Oh, you're in [REDACTED]?		
16	A. Yeah.		
17	Q. Well, there you go. Just curious, what time of the		
18	day is it there?		
19	A. It's 5:00 p.m.		
20	Q. Well, there you go. Fun. Okay. Sounds good. Is		
21	there anyone present with you in the immediate area		
22	at your apartment?		
23	A. No.		
24	Q. Do you have any documents in front of you?		
25	A. No.		

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<p>1 lawsuit?</p> <p>2 A. Yes.</p> <p>3 Q. All right. Then I will ask no further questions on</p> <p>4 that topic of your conversation.</p> <p>5 I want to get a little bit of background on</p> <p>6 you. Can you just in your own words give me a post</p> <p>7 high school outline for me your educational</p> <p>8 experience?</p> <p>9 A. Sure. So I started my college career at the</p> <p>10 University of Wisconsin-Green Bay. I went there for</p> <p>11 two years. I then transferred to UW-Whitewater. I</p> <p>12 graduated from UW-Whitewater in 2003 with a degree in</p> <p>13 learning disabilities pre K through 9.</p> <p>14 Q. Can I interrupt you real quick? Was that a bachelors</p> <p>15 degree?</p> <p>16 A. Sorry, yes.</p> <p>17 Q. Keep going.</p> <p>18 A. I then went back to UW-Whitewater in 2006 I think and</p> <p>19 I got my autism certificate. In 2011 I got my</p> <p>20 masters degree in human services with an emphasis on</p> <p>21 social and community relations. And then in 2019 I</p> <p>22 received my national board certification in the area</p> <p>23 of exceptional needs. It's -- I think it's</p> <p>24 preadolescent to adolescent or 21.</p> <p>25 Q. Where did you get your masters degree from?</p>	Page 7	<p>1 in Kaiserslautern, Germany on a military base at</p> <p>2 Vogelweh Elementary School.</p> <p>3 Q. Are you teaching elementary children at like as a</p> <p>4 teacher there in Germany?</p> <p>5 A. Yes. I am a -- my actual job title is teacher of the</p> <p>6 emotionally disturbed.</p> <p>7 Q. How long have you worked there in Germany in that</p> <p>8 position?</p> <p>9 A. This will be my second year.</p> <p>10 Q. Where did you -- Strike that.</p> <p>11 As you sit here today, do you plan, and I</p> <p>12 know this is always a hard question, but do you plan</p> <p>13 to remain in that position in Germany indefinitely,</p> <p>14 or do you have plans to like come back?</p> <p>15 A. I have until the beginning of March to make that</p> <p>16 decision.</p> <p>17 Q. Okay.</p> <p>18 A. Currently my thought is that I will be returning to</p> <p>19 Verona, yes.</p> <p>20 Q. Okay. Are you on a leave of absence at Verona Area</p> <p>21 School District?</p> <p>22 A. Yes, I was granted two years leave of absence.</p> <p>23 Q. Okay. Did you then -- the last school year that you</p> <p>24 worked in the Verona Area School District was what</p> <p>25 school year?</p>	
<p>1 A. The university of -- it's Capella University.</p> <p>2 Q. Is that with a C?</p> <p>3 A. Yes.</p> <p>4 Q. And what did you have to do to obtain the national</p> <p>5 board certification?</p> <p>6 A. I had to -- there is four components to receiving</p> <p>7 your national boards, so I had to do -- I mean</p> <p>8 complete all four components which included, you</p> <p>9 know, video recording and especially just looking at</p> <p>10 my education, how I am as a teacher and take a look</p> <p>11 at it and then submit it.</p> <p>12 Q. Got it. Do you have to actually attend any sort of</p> <p>13 schooling or class work to do that, or is it more</p> <p>14 compiling kind of your breadth and wealth of</p> <p>15 knowledge and experience in a format for them?</p> <p>16 A. It's --</p> <p>17 MS. HENRY: Object to form. Go ahead.</p> <p>18 THE WITNESS: Sorry. It's about compiling</p> <p>19 and analyzing your education.</p> <p>20 BY MS. LUBINSKY:</p> <p>21 Q. Okay. I understand. Have we now completed our</p> <p>22 discussion of your education after high school?</p> <p>23 A. Yes.</p> <p>24 Q. Where are you currently employed?</p> <p>25 A. I am currently employed for the Department of Defense</p>	Page 9	<p>1 A. Um --</p> <p>2 Q. Would it be '20-'21?</p> <p>3 A. Yes, sorry. Yes.</p> <p>4 Q. And for Vicky's benefit, when we talk about '20-'21,</p> <p>5 we're talking about '20-'21, right?</p> <p>6 A. Yes.</p> <p>7 Q. We talk about school years in your world and my world</p> <p>8 as the fall would be, for example, in our, what we</p> <p>9 just discussed, 2020, and then the spring would be</p> <p>10 2021, right?</p> <p>11 A. Yes.</p> <p>12 Q. So in today's deposition I may talk about the '18-'19</p> <p>13 school year or the '19-'20 school year, and you</p> <p>14 understand what I'm referring to, right?</p> <p>15 A. Yes.</p> <p>16 Q. Very good. Just getting some understanding that</p> <p>17 we're communicating clearly. Okay.</p> <p>18 And as I understand it, you worked as a</p> <p>19 teacher for the Verona Area School District from your</p> <p>20 graduation from UW-Whitewater in 2003 all the way up</p> <p>21 to the '19-'20 school year; is that correct?</p> <p>22 A. Yes.</p> <p>23 Q. And I am horrible at math, so I'm going to see if</p> <p>24 you're better than I am.</p> <p>How many school years, like how many years</p>	

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1 of teaching did you have before you went over to 2 Germany? 3 A. 17. 4 Q. Got it. From time to time I may pause and it's just 5 because I'm taking notes, so just be a little patient 6 with me. 7 I want to talk a little bit about your 8 experience at Verona Area School District over those 9 17 years, okay. When you first commenced employment 10 with Verona, were you a special -- were you hired as 11 a special education teacher? 12 A. Yes. 13 Q. And was that your title for the entirety of the 17 14 years you worked there? 15 A. I believe our title is cross-categorical special 16 education teacher. 17 Q. Okay. And was that a title you had for the entirety 18 of the 17 years? 19 A. Yes. 20 Q. What building did you work in when you commenced 21 employment with the district back in '03? 22 A. Savanna Oaks Middle School. 23 Q. Did that change at all meaning the location of where 24 you taught, did that change at all in your 17 years 25 or did you stay at Savanna Oaks the entire time?	1 Q. Could you spell that last name? 2 A. E S -- hold on. E S C K R I C H. 3 Q. Very good. How long was Sandy the principal at 4 Savanna Oaks? 5 A. I'm not for sure. I think it was like between 8 6 to -- 8 ish years, 5 to 8 years I think. 7 Q. That's good enough for me. We don't have to go back 8 further than that. Let's talk about your director, 9 your pupil services supervisor, you said it was 10 Sandra Buxton the last year you worked there. How 11 long was Sandra the supervisor for purposes of 12 special ed? 13 A. At Savannah Oaks I think that was her second or third 14 year. 15 Q. Okay. Let's go back one prior to Sandra then. 16 Do you recall who the supervisor from the 17 special ed standpoint you had prior to Sandra? 18 A. Well, that year they did a little bit of changing 19 when Sandra kind of became the supervisor. But 20 before that my supervisor would have been Emmett 21 Durtschi. 22 Q. And how long was Emmett your supervisor? 23 A. He was the pupil services person I think for maybe 10 24 years I think. 25 Q. Okay. That's good enough. We're not going to go
Page 11	Page 13
1 A. No, I stayed at Savanna the entire time. 2 Q. Who was your supervisor at Savanna Oaks the last 3 school year that you were there which would have been 4 the '19-'20 school year? 5 A. Well, I mean -- 6 MS. HENRY: Objection -- 7 MS. LUBINSKY: Hold on. I want to 8 withdraw that question. I'm going to pause. 9 BY MS. LUBINSKY: 10 Q. Stacy, was the last year you worked at Verona the 11 2020-2021 school year? 12 A. Yes. 13 Q. Who was your supervisor that school year? 14 A. Could you be more specific regarding like my special 15 ed supervisor or the principal? 16 Q. Why don't you give me both because I do understand 17 you might have kind of reported to the principal and 18 the special ed director. I get that. Why don't you 19 just give me both. 20 A. Okay. The principal at that time was Paris Echoles. 21 My special ed supervisor was Sandra Buxton. 22 Q. How long had Paris Echoles been your supervisor? 23 A. Just that year. 24 Q. Who was the principal at Savanna Oaks prior to Paris? 25 A. Sandy Esckrich.	1 back further than that. Okay. And at Savannah Oaks, 2 let's just say in the last few years you were there, 3 the last two or three school years, could you just 4 describe for me -- first of all, it's a middle 5 school, correct? 6 A. Yes. 7 Q. And every middle school, well, not every one but 8 middle schools are different, so I'm going to ask, 9 what grade levels did Savannah Oaks have in the two 10 or three years before you left for Germany? 11 A. Six, seven and eight. 12 Q. And can you give me just a big picture overview of 13 the types of students you worked with? 14 A. Could you clarify? 15 Q. Yup. 16 A. Do you want labels? 17 Q. Fair point. So I know a lot about special ed. If 18 you can give me kind of the educational under their 19 IEPs, they were evaluated, are these EBD kids, are 20 these LD kids, are these OHI kids, or are they a 21 combination of several. If you give me kind of the 22 educational label, I can then understand the types of 23 kiddos that you're working with. 24 MS. HENRY: Just object to the form but go 25 ahead.

<p style="text-align: right;">Page 14</p> <p>1 THE WITNESS: I had all, I mean many 2 different labels. So I had LD students, I had EBD 3 students, I had hearing impaired students, I had 4 intellectual disability students, I had a student 5 with -- I had students with autism, OHI. So just 6 about everything under the sun we had.</p> <p>7 BY MS. LUBINSKY:</p> <p>8 Q. Okay. Were you working in self-contained classrooms 9 with students, or were you servicing students in 10 their general ed environment or both?</p> <p>11 A. Both.</p> <p>12 Q. Did you work with a team of teachers?</p> <p>13 A. Do you mean special ed teachers?</p> <p>14 Q. Yes.</p> <p>15 A. Yes.</p> <p>16 Q. Can you just describe for me how your team was kind 17 of organized? In other words, for example, for 18 example only, we had three special ed teachers 19 servicing sixth grade or however it was organized.</p> <p>20 A. Yeah, the configuration kind of changed throughout 21 the years, but it typically in the last, the 22 timeframe we're talking about, there was two teachers 23 at 6th grade, two teachers at 7th grade and two 24 teachers at 8th grade. Those are special ed 25 teachers.</p>	<p style="text-align: right;">Page 16</p> <p>1 hired? 2 MS. HENRY: Objection, foundation. Go 3 ahead.</p> <p>4 THE WITNESS: I don't know that there is a 5 typical timeframe. I think since I have kind of 6 started in special ed, special ed teachers are 7 always needed. So I think it's -- I don't know that 8 there was a typical timeframe.</p> <p>9 BY MS. LUBINSKY:</p> <p>10 Q. Okay. Other than your stint at Germany, did you ever 11 have other teaching employment from 2003 to the 12 present other than at the Verona Area School 13 District?</p> <p>14 A. No.</p> <p>15 Q. Okay. Did you ever teach summer school?</p> <p>16 A. I did extended school year.</p> <p>17 Q. Okay. For Verona?</p> <p>18 A. Yes.</p> <p>19 Q. Got it. All right. Very good. So when you were 20 hired in 2003, tell me about what you remember about 21 any discussions regarding starting salary.</p> <p>22 A. There wasn't really a discussion. I was super 23 excited to get hired. I was happy to have like my 24 first real job and I accepted it.</p> <p>25 Q. Okay. At any time from 2003 prior to Germany did you</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. That's actually very helpful, okay. I can understand 2 that now.</p> <p>3 Did you in the last two or three years, did 4 you teach at 6, 7 or 8?</p> <p>5 A. I was at 6, and I think I may have had a student or 6 two in 7th grade.</p> <p>7 Q. Okay. And then because I know you were there from 8 '03 through then, did you previously work with 8th 9 graders in some years and 7th graders in some years 10 or not?</p> <p>11 A. Yes, I've worked at all the grade levels at some 12 point.</p> <p>13 Q. Okay. Understood. I want to go back to 2003. You 14 graduated from UW-Whitewater. Did you apply at 15 several schools before you landed at Verona?</p> <p>16 A. Yes.</p> <p>17 Q. And tell me a little bit about what you remember 18 about your hiring process at Verona.</p> <p>19 A. I remember I was -- it was August and I interviewed 20 and a couple days later I was asked for the position 21 -- or I was offered the position, excuse me. And 22 then a couple days later school started.</p> <p>23 Q. What is your, from all of your years of experience, 24 what is your understanding of the typical time that special education teachers apply for jobs and get</p>	<p style="text-align: right;">Page 17</p> <p>1 apply for a job in another school district as a 2 teacher?</p> <p>3 A. Not that I recall.</p> <p>4 Q. I know that's a long timeframe, so I know I'm tapping 5 into your memory there.</p> <p>6 A. Yeah.</p> <p>7 Q. As you continued year over year working for Verona, 8 did you -- can you describe for me how, and I'm not 9 looking for numbers, okay, but how prior -- let me 10 start my question over.</p> <p>11 Prior to Act 10, all right, did your salary 12 at Verona move consistent with the then existing 13 salary schedule, that is that you would move, in 14 essence if you had another year of experience, you 15 would move a step or once you got your masters you 16 would move over a lane?</p> <p>17 A. I don't remember the going down part, but I do know 18 that you went over if you had credits or obtained 19 your masters degree.</p> <p>20 Q. Okay. Let me maybe try it this way because I don't 21 think it's an issue in this case.</p> <p>22 Before Act 10 do you believe your yearly 23 salary was increased in accordance with the then 24 existing salary schedules?</p> <p>25 A. I believe so, yes.</p>

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<p>1 Q. Prior to Act 10 were you involved in the teachers 2 union at Verona?</p> <p>3 MS. HENRY: Objection, vague. Go ahead.</p> <p>4 BY MS. LUBINSKY:</p> <p>5 Q. You may answer. If you answered, Stacy, we didn't 6 hear you or at least I didn't.</p> <p>7 A. Yes.</p> <p>8 Q. What was your involvement prior to Act 10?</p> <p>9 A. I was a member.</p> <p>10 Q. And did you have any leadership roles in the union 11 prior to Act 10?</p> <p>12 A. No.</p> <p>13 Q. After Act 10 were you a member of the teachers union?</p> <p>14 A. Yes.</p> <p>15 Q. Did you have any leadership roles in the union at any 16 time after Act 10?</p> <p>17 A. Yes.</p> <p>18 Q. When did you commence having a leadership role in the 19 teachers union?</p> <p>20 A. 2017 I became one of the union presidents.</p> <p>21 Q. And were you elected union president, appointed or 22 some other process?</p> <p>23 A. Elected.</p> <p>24 Q. And I'm assuming elected by the members of the union?</p> <p>25 A. Yes.</p>	<p>1 other employees in the district had with human 2 resources or other management in the district wherein 3 a discussion of a request for a salary increase 4 occurred?</p> <p>5 A. Yes.</p> <p>6 Q. How many times do you think you were present and 7 involved in those discussions?</p> <p>8 A. One.</p> <p>9 Q. And what is the name of the other employee who you 10 were present when this discussion occurred?</p> <p>11 A. I don't remember his name. I'm sorry.</p> <p>12 Q. That's okay. Can we -- was it a male?</p> <p>13 A. Yes.</p> <p>14 Q. I have some emails. It might trigger a memory. Just 15 one second. Any chance the name Andrew Close sounds 16 familiar?</p> <p>17 A. Yes.</p> <p>18 Q. Or I also saw something involving you and a David 19 Watson? I'm not sure if either of those names 20 refresh your recollection as to who the employee was 21 who you actually were present when there was a 22 discussion about their salary?</p> <p>23 A. It was Andrew Close.</p> <p>24 Q. Okay.</p> <p>25 A. He was a -- yeah.</p>
Page 19	Page 21
<p>1 Q. Okay. So at any time prior to your election as a 2 union president did you sit in on any discussions any 3 other employees had with human resource -- with any 4 employee of the Verona School District regarding the 5 request for a salary increase?</p> <p>6 A. Could you repeat the question again?</p> <p>7 Q. Absolutely. Yeah. Sometimes they're long. 8 Prior to becoming union president did you 9 ever sit in on discussions any employee in the 10 district had with any kind of management or HR 11 employee of the district where the topic was a salary 12 increase or a requested salary increase?</p> <p>13 A. Not that I can remember, no.</p> <p>14 Q. Did you personally ever make a request prior to you 15 becoming union president for your salary to be 16 increased more than it otherwise would in accordance 17 with the salary schedules?</p> <p>18 A. No.</p> <p>19 Q. Okay. So then I want to talk about then you became 20 the union president. Do you happen to recall when in 21 2017 that was?</p> <p>22 A. The beginning of the -- so, sorry, August 2017.</p> <p>23 Q. Okay. After August of 2017 up through the time you 24 go to Germany, were you involved in any discussions 25 other employees of the district, not yourself, but</p>	<p>1 Q. And let's just get a little bit of background. Do 2 you have -- when was this? Was this like 2017, '18, 3 '19? If you remember?</p> <p>4 A. I don't remember.</p> <p>5 Q. Okay. I have emails from Andrew Close in August of 6 2019 where you are copied. I'm just going to read 7 it. It says, dear Jason, I would like to meet with 8 you to talk about my salary schedule placement. I'm 9 bringing Stacy Tremaine to represent me. I was 10 wondering if you would be able to meet. 11 And then he gives some dates. So if I'm 12 accurately portraying the email, does August of '19 13 sound about right, Stacy?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. And what was Andrew -- what type of teacher 16 was Andrew?</p> <p>17 A. He was a math teacher at the high school I believe.</p> <p>18 Q. Can you just tell me in your best memory what you 19 recall of the discussion that occurred involving 20 Andrew's request for a review or an increase in his 21 salary?</p> <p>22 A. So I remember going to the meeting. He -- what I 23 remember is that he had his masters degree, and he 24 was also English language certified I think, ELL 25 certified. And he talked to Jason about his</p>

<p style="text-align: right;">Page 22</p> <p>1 certifications because even he was a brand new 2 teacher and he was placed on the initial educator 3 column, and he wanted to be in the masters column.</p> <p>4 Q. You have a darn good memory because I have an email 5 from Jason on August 14 that indicates that he was 6 going to increase Andrew's salary placement from 7 provisionally licensed educator step two to 8 provisionally licensed educator step four in 9 recognition of the ESL certification. Does that seem 10 consistent with your memory?</p> <p>11 A. Yes.</p> <p>12 Q. Do you know what it means, Stacy, to be a 13 provisionally licensed educator?</p> <p>14 A. Yes. A provisionally licensed educator are educators 15 that are their first two years in education.</p> <p>16 Q. And you understand at least -- let me try it this 17 way. 18 Do you understand that Verona's teacher 19 schedule has for some time, I can't tell you how long 20 it goes back, but at least since 2017, has had a 21 separate lane for provisionally licensed teachers?</p> <p>22 A. Yes.</p> <p>23 Q. All right. And I want to kind of clear that 24 discussion.</p> <p>25 Have you now told me everything you can</p>	<p style="text-align: right;">Page 24</p> <p>1 And I'm going to show you a date. Bear 2 with me. This is going to help us frame the 3 question.</p> <p>4 MS. LUBINSKY: Let's go off the record. 5 (Discussion off the record.) 6 (Exhibit 1 marked.)</p> <p>7 BY MS. LUBINSKY:</p> <p>8 Q. I am putting in front of you, Stacy, and we'll mark 9 as Tremaine Exhibit 1 -- which Vicki, I will email 10 you afterwards -- a letter that has a date of March 11 23, 2020.</p> <p>12 First of all, Stacy, let's communicate, are 13 you seeing that letter on your screen?</p> <p>14 A. Yes.</p> <p>15 Q. And do you see in the first paragraph it says, and 16 I'm not reading verbatim, I write on behalf of Stacy 17 Tremaine regarding her salary?</p> <p>18 A. Yes.</p> <p>19 Q. And then let's just look at the signature line real 20 quick. This is signed by an Elizabeth Fernandez, 21 legal counsel at WEAC, correct?</p> <p>22 A. Yes.</p> <p>23 Q. All right. So now let me go back to my question. 24 And we're going to use the date of this email in my 25 question, or the date of this letter, excuse me.</p>
<p style="text-align: right;">Page 23</p> <p>1 recall as you sit here today about the conversation 2 involving Andrew Close?</p> <p>3 A. Yes.</p> <p>4 Q. And was it you, Andrew and Jason Olson present and 5 nobody else?</p> <p>6 A. I believe so, yes.</p> <p>7 Q. Okay. Was there any discussion in that conversation 8 of Andrew's sex or gender?</p> <p>9 A. No.</p> <p>10 Q. And so I can complete my notes here, Andrew is the 11 only employee who you kind of were present when they 12 made a request or an ask for a review or an increase 13 of their salary. Do I have that right?</p> <p>14 A. That I remember, yes.</p> <p>15 Q. Fair enough. Okay. We'll move off that topic. 16 I asked you previously if you ever prior to 17 Act 10 went in to see -- to ask for an increase in 18 your salary, and you said you didn't. So now I'm 19 going to complete it up until the time you leave for 20 Germany. 21 Did you, Stacy, ever send an email or go 22 into the office of human resources to ask for review 23 or consideration of a salary increase for you?</p> <p>24 A. I did send a letter of demand.</p> <p>25 Q. That's a great point. Let me rephrase my question.</p>	<p style="text-align: right;">Page 25</p> <p>1 Here is my question. 2 At any time after Act 10 was passed and 3 prior to this letter dated March 23, 2020, did you, 4 Stacy, ever via email, in person, telephone, ever 5 request that the Verona School District consider a 6 review or increase in your salary above and beyond 7 what you would ordinarily get from the salary 8 schedules?</p> <p>9 A. No.</p> <p>10 Q. Okay. I'm going to come back to Exhibit 1, but for 11 now I'm going to stop share so I can see you. 12 All right. Tell me, Stacy, in your own 13 words how you believe Act 10 changed the landscape of 14 teacher negotiation in Wisconsin.</p> <p>15 MS. HENRY: Objection, foundation. Go 16 ahead.</p> <p>17 MS. LUBINSKY: Well, I'll back up.</p> <p>18 BY MS. LUBINSKY:</p> <p>19 Q. Stacy, you were a teacher in Wisconsin when Act 10 20 was passed, right?</p> <p>21 A. Yes.</p> <p>22 Q. Just out of curiosity, I'm looking out across my 23 building here to the Capital. Were you one of those 24 many thousands of teachers that came to the Wisconsin 25 Capital to protest Act 10?</p>

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<p>1 A. No.</p> <p>2 Q. Okay. After Act 10 was passed, did the Verona Area</p> <p>3 School District -- Strike that.</p> <p>4 You were a member of the union from the</p> <p>5 time Act 10 was passed up until the time you became a</p> <p>6 president, the president of the union, correct?</p> <p>7 A. Yes.</p> <p>8 Q. And in your role as member, and I'm not sure how</p> <p>9 active of a member you were, so I'm going to just try</p> <p>10 to flesh that out a bit. That's the next series of</p> <p>11 my questions.</p> <p>12 From that time period, 2011 to 2017, just</p> <p>13 describe for me like as a member of the union would</p> <p>14 you attend meetings regularly?</p> <p>15 A. Define regularly.</p> <p>16 Q. How often would the teachers union in Verona meet</p> <p>17 from the passage of Act 10 until about 2017 when you</p> <p>18 became president?</p> <p>19 A. I think they probably met once every other month</p> <p>20 maybe.</p> <p>21 Q. And assuming that to be the schedule, how frequently</p> <p>22 would you attend those meetings?</p> <p>23 A. Maybe twice a year.</p> <p>24 Q. Okay. Did you have an understanding of what the</p> <p>25 teachers union was doing in those years as it relates</p>	<p>1 first year as I was the union president. So she kind</p> <p>2 of mentored me throughout the year on grievance</p> <p>3 things, the handbook, how to read the handbook.</p> <p>4 Q. Okay. Who was your mentor?</p> <p>5 A. Sue Stodola.</p> <p>6 Q. Would that be S T O D O L A?</p> <p>7 A. Yeah.</p> <p>8 Q. Just like it sounds. Okay. Sounds good.</p> <p>9 After you became the president of the union</p> <p>10 up through the time you go to Germany, were you on, I</p> <p>11 don't know what you would call it, the negotiations</p> <p>12 team?</p> <p>13 A. Yes.</p> <p>14 Q. Is that what you called it?</p> <p>15 A. Yes.</p> <p>16 Q. All right. And when was the first time as part of</p> <p>17 the negotiations team but after you became the</p> <p>18 president that you actually performed work in kind</p> <p>19 of, you know, advancing the union's interest with</p> <p>20 regard to negotiation?</p> <p>21 A. Probably I would say the spring of 2017.</p> <p>22 Q. Can you just in your own words describe for me what</p> <p>23 role you played on the negotiations team in the</p> <p>24 spring of '17?</p> <p>25 A. I was part of the negotiations committee, but I would</p>
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<p>1 to teachers salary?</p> <p>2 A. No.</p> <p>3 Q. And that's fine. If you kind of took a back seat</p> <p>4 role prior to becoming a president, I will accept</p> <p>5 that testimony. So let me just, before I move on, I</p> <p>6 want to make sure I'm not going to get surprised at</p> <p>7 trial, okay.</p> <p>8 So Stacy, was your involvement from after</p> <p>9 -- in the union at Verona, after the passage of Act</p> <p>10 10 but before you came -- became the president, a</p> <p>11 fairly passive role?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. That's fine. I will move on.</p> <p>14 Once you became the president in the fall</p> <p>15 of 2017, did you familiarize yourself with the role</p> <p>16 the union played relative to negotiations with the</p> <p>17 district?</p> <p>18 A. I'm sorry, can you repeat that again?</p> <p>19 Q. Absolutely. Let me just let you talk.</p> <p>20 Once you became a president, the president</p> <p>21 of the union, fall of '17, what did you do to kind of</p> <p>22 get up to speed and familiarize yourself enough to be</p> <p>23 the union president understanding that you kind of</p> <p>24 came from more of a passive role?</p> <p>25 A. Yeah. So I had a mentor that was mentoring me for my</p>	<p>1 say during that year the committee pretty much</p> <p>2 existed of one person that did the majority of the</p> <p>3 negotiations. So it was a very passive, I didn't</p> <p>4 have much influence or conversation that year.</p> <p>5 Q. And who was that person that you were just referring</p> <p>6 to?</p> <p>7 A. John Bremmer.</p> <p>8 Q. B R E M M E R?</p> <p>9 A. Yes. I think, yes.</p> <p>10 Q. And then did you, after that negotiation was</p> <p>11 completed, were you involved in the negotiations for</p> <p>12 the next school year which would be the 17-'18 school</p> <p>13 year?</p> <p>14 A. I believe it's the '18-'19 school year. But yes.</p> <p>15 Q. Okay. And what was your involvement in the</p> <p>16 negotiations over the '18-'19 school year salary?</p> <p>17 A. I was part of the committee, and we would meet</p> <p>18 regularly with people from central office.</p> <p>19 Q. What do you recall of those negotiations regarding</p> <p>20 the '18-'19 school year?</p> <p>21 A. I remember us talking about the salary schedule and</p> <p>22 attempting to place people on the schedule based upon</p> <p>23 years of service or years of -- yeah, years of</p> <p>24 service.</p> <p>25 Q. Years of service at Verona or years of experience</p>

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<p>1 overall?</p> <p>2 A. Years of experience overall.</p> <p>3 Q. Okay. And what else, if anything, do you recall of 4 those negotiations -- let me ask a better question.</p> <p>5 So it sounds like there was an effort made 6 by the union, and you were on that team, to place 7 people on the salary schedule based on years of 8 experience overall. Was the union successful at all 9 in convincing, I'll just call it management for lack 10 of a better word, to agree to that suggestion?</p> <p>11 A. No.</p> <p>12 Q. Okay. Was it not -- what was your understanding as 13 to how individuals were placed on the salary schedule 14 as of the '18-'19 school year if not based on overall 15 experience?</p> <p>16 A. My understanding was they were arbitrationally put on 17 there. There was no rhyme or reason.</p> <p>18 Q. What was that based on?</p> <p>19 A. Could you explain like what --</p> <p>20 Q. Yeah, you bet. I'll try it again.</p> <p>21 What was your understanding based on? And 22 the understanding I'm referring to is the 23 understanding that people were placed on the salary 24 schedule with no rhyme or reason.</p> <p>25 A. Because some people were placed based upon, like when</p>	<p>1 A. Yes.</p> <p>2 Q. Or is there more that you can recall?</p> <p>3 A. No.</p> <p>4 Q. All right. Were you involved as a member of the 5 teachers union in the contract negotiations 6 concerning the '19-'20 school year?</p> <p>7 A. Yes.</p> <p>8 Q. What do you remember of those negotiations?</p> <p>9 A. I remember that we, again, were trying to get people 10 placed on the salary schedule based upon years of 11 service, and it was unsuccessful during that time.</p> <p>12 Q. Were there certain individuals that you -- Strike 13 that. I want to make sure I understand what you're 14 telling me. We'll focus in on the '19-'20 school 15 year for now.</p> <p>16 Was the union seeking to have specific 17 existing employees of the Verona Area School District 18 placed in a different step or lane on the salary 19 schedule than they were at at the present time?</p> <p>20 A. Could you repeat that question again? I'm sorry.</p> <p>21 Q. Sure. What I'm trying to figure out is whether you 22 were advancing a desire that going forward new hires 23 would be placed on the salary schedule at their years 24 of experience or whether you and the union were advancing that certain existing VASD employees be</p>
Page 31	Page 33
<p>1 I looked at people on the salary schedule, some 2 people had, you know, 10 years of experience but were 3 on, you know, in lane 7, you know. Some people had, 4 you know, a masters degree and 20 years of experience 5 but were on lane 2. So it didn't seem to make any 6 sense to me where they were placed on the salary 7 schedule.</p> <p>8 Q. And you did not make decisions in terms -- Strike 9 that. I'll ask you a simple question.</p> <p>10 You never were in a role in the district 11 where you made the decision as to where somebody was 12 placed on the salary schedule, correct?</p> <p>13 A. No.</p> <p>14 Q. My statement was correct?</p> <p>15 A. Yes, yes. Sorry, yes.</p> <p>16 Q. No, you're good. You're good.</p> <p>17 And did you -- so it sounds like there was 18 an effort made regarding the '18-'19 school year 19 negotiations that the union was asking for 20 individuals to be placed on the salary schedule based 21 on experience, and that effort was not successful. 22 Would that be a fair summary?</p> <p>23 A. Yes.</p> <p>24 Q. All right. Have we now covered what you remember of 25 the '18-'19 negotiations?</p>	<p>1 placed in a different step or lane on the salary 2 schedule based on their years of experience --</p> <p>3 MS. HENRY: Object to the form.</p> <p>4 MS. LUBINSKY: -- or both. Sorry, Ann.</p> <p>5 Go ahead.</p> <p>6 MS. HENRY: Just object to the form, 7 compound. Go ahead, Stacy.</p> <p>8 THE WITNESS: Both.</p> <p>9 BY MS. LUBINSKY:</p> <p>10 Q. All right. So if I'm understanding correctly, I want to get a nice, clear, record, Stacy. During the 11 2019-'20 school year negotiations, it's your 12 testimony that the union was advancing both that new 13 hires be placed on the salary schedule in accordance 14 with their experience and that the Verona Area School 15 District reclassify existing employees on the then 16 existing salary schedule based on their years of 17 experience; is that correct?</p> <p>18 A. Yes.</p> <p>19 Q. Did you ever quantify or monetize what the cost to the district would have been for the latter ask that 20 the union had?</p> <p>21 A. Did I quantify it?</p> <p>22 Q. We'll start there.</p> <p>23 A. No.</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. Did the union to your knowledge quantify the cost to 2 the district of the latter, that is reclassifying 3 existing employees based on years of experience? 4 A. Yes. 5 Q. And who performed that analysis, if you know? 6 A. I don't know. 7 Q. Okay. Do you happen to recall what the economic 8 impact would have been for one school year to do what 9 the union was advancing at least with respect to 10 existing employees? 11 A. I don't recall. 12 Q. And was the quantification solely of special 13 education teachers or were there other teachers? 14 A. At the time of our negotiations it was -- we were 15 including all teachers to be placed based upon their 16 years of service. 17 Q. And when you say all teachers, you mean all existing 18 Verona Area School District teachers, right? 19 A. Yes. 20 Q. And I want to make sure I get a complete record. I 21 think I know the answer. You believe there was 22 someone quantified the economic impact to the 23 district of doing what we just talked about, placing 24 all existing teachers on the salary schedule based on 25 your year of experience, but you don't know who did</p>	<p style="text-align: right;">Page 36</p> <p>1 remember of what the union was advancing relative to 2 salary? 3 A. I recall that it was a continued effort to try to get 4 people placed based upon years of service as well as 5 new employees put on the salary scale based upon 6 their years of service. 7 Q. Okay. Let me try it this way, Stacy, because I know 8 it's been a long time. 9 Was the negotiations in 2020-2021 more of 10 the same and similar to the prior years? 11 A. Yes. 12 Q. Okay. Does anything stand out at you as different 13 during the negotiations regarding the 2020-2021 14 school year? 15 A. No. 16 Q. And then just last few questions on that, do you know 17 whether anyone quantified the financial impact to the 18 district of the ask that you are -- that you as the 19 union made for that school year? 20 A. Yes. 21 Q. Do you know who did it? 22 A. No. 23 Q. Do you know what the end result was? 24 A. No. 25 Q. Sometimes we have to repeat ourselves, so I knew you</p>
<p style="text-align: right;">Page 35</p> <p>1 it and you don't know what the end result is. Have I 2 summarized that fairly? 3 A. Yes. 4 Q. Okay. All right. Do you know whether such a 5 quantification was done for the '18-'19 school year? 6 A. I don't recall. 7 Q. Okay. Have we now covered what you can recall of the 8 negotiations that you were involved in in your work 9 as a union president during that -- for the '19-'20 10 school year? 11 A. Yes. 12 Q. And then were you involved for the -- I apologize. 13 Did you work in Verona for the '20-'21 14 school year? 15 A. Yes. 16 Q. Okay. I know I asked you that already. It's just up 17 in my notes. Okay. 18 And were you involved in the -- were you 19 involved as the union president regarding 20 negotiations? 21 A. Yes. 22 Q. And what was your involvement? 23 A. I was part of the negotiations committee. 24 Q. And with respect to that school year, can you, based 25 on your memory, can you recall and tell me what you</p>	<p style="text-align: right;">Page 37</p> <p>1 were going to say that. Just had to get a nice, 2 clear record. Okay. 3 And to be clear, before I move off this 4 topic, what your memory is is that the union was 5 advancing that all Verona Area School District 6 employees, not just special education teachers and 7 social workers, but all Verona Area School District 8 employees be placed on the district's salary schedule 9 in accordance with their years of experience? 10 A. Yes. 11 Q. Okay. All right. 12 MS. LUBINSKY: I need to take a one minute 13 break just to do my blinds. 14 (Pause.) 15 BY MS. LUBINSKY: 16 Q. When did you leave for Germany? 17 A. August of 2021. 18 Q. And earlier you told me you're on an approved two 19 year leave of absence? 20 A. Yes. 21 Q. And if you return, let's just assume you do, is it 22 your understanding that you will kind of have all of 23 the same attendant benefits that you would have had 24 had you remained in the district for the two years 25 that you have been in Germany?</p>

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1 A. Could you define defendant benefits?	1 in Verona.
2 Q. Yeah, sure. Let's take an example.	2 Q. Okay. That's a fair point. Let me ask my question
3 You having been hired in 2003 in the	3 in a better way.
4 district, you have -- you understand that if you	4 Why have you not applied for another
5 remain in the district for a certain number of years,	5 teaching job other than Germany since you began work
6 you have certain retirement benefits. And I'm not	6 in Verona in 2003?
7 talking about WRS benefits, I'm talking about	7 A. Because I enjoyed my work, I enjoyed working for
8 retirement benefits provided by the Verona Area	8 Verona. I liked it. I liked my colleagues. I
9 School District, right?	9 enjoyed it.
10 A. Yes.	10 Q. Okay. And have you ever -- Strike that.
11 Q. All right. And we'll take that example. Is it your	11 Are you aware of whether other districts in
12 understanding that when you, assuming you return,	12 the surrounding area of Verona, by that I mean just
13 when you return you will still be eligible for those	13 any place you could drive to wherever you lived in
14 same benefits?	14 Verona, okay, and by drive to, I mean for a
15 A. Yes.	15 reasonable commute, whatever you would deem that to
16 Q. Okay. And I'm just curious, I'm not sure it's	16 be, you and I would both agree there are many school
17 relevant or it matters but do you know if you return	17 districts in and around Verona that you could drive
18 whether you're going to get kind of two years of	18 to with a reasonable commute, right?
19 credit for the purpose of your years of service at	19 A. Yes.
20 Verona?	20 Q. All right. Do you know whether other school
21 A. I don't know.	21 districts, by other, I mean other than Verona, pay
22 Q. Okay. And I'm asking for an example. Let me give	22 more to -- for special education teachers with your
23 you an example.	23 years of experience?
24 The retirement benefits attendant to	24 A. I don't know.
25 somebody like you who was hired in 2023, you would	25 Q. Do you know whether any of those same districts pay
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1 agree with me that if you stay at Verona for a	1 less than Verona?
2 certain number of years, you will be -- and retire,	2 A. I don't know.
3 you will be eligible for certain retirement benefits,	3 Q. So judging from your answers, this is going to be an
4 right?	4 obvious question, you have done no investigation to
5 A. Yes.	5 ascertain how much other special education teachers
6 Q. And I was just curious if you know, and if you don't,	6 in schools surrounding the Verona School District pay
7 it's okay, I will move on, but whether your two years	7 to their special education teachers, right?
8 of experience in Germany will be counted toward	8 A. Right.
9 whatever that level is for retirement, whether it's	9 Q. Do you value the education -- Strike that.
10 20 years, 25 years, 30 years. Do you know whether	10 Do you personally place value on your
11 the two years in Germany will count?	11 retirement benefits that you would be eligible to
12 A. I do not know.	12 receive for Verona if you stay, whatever the number
13 Q. Okay. But you do know one thing, regardless of	13 of years are, that is required under the plan that's
14 whether they count, when you come back, if you come	14 effective for you?
15 back to Verona, you will at a minimum pick back up on	15 A. Could you repeat that again, please?
16 years of service where you were at the end of the	16 Q. Yeah. I'll try to make it more simple.
17 2020-'21 school year?	17 Do you, Stacy, place value in the
18 A. Yes.	18 retirement benefits to which you will be entitled if
19 Q. Okay. I understand. Why, Stacy, have you not looked	19 you remain at Verona until you become eligible for
20 for another job or applied -- Strike that. Let me	20 the retirement benefits?
21 ask a better question.	21 A. When you say value, could you be more specific?
22 Why have you not applied for another job	22 Q. Sure. Is it something that you believe is -- is it
23 beyond Verona other than your work, your leave of	23 something that you believe is going to be financially
24 absence in Germany?	24 helpful for you when you retire?
25 A. I hadn't applied for another teaching job since being	25 A. Yes.

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<p>1 Q. Have you quantified based on -- Strike that.</p> <p>2 Let's get a little foundation out because</p> <p>3 I'm sensing you might know more than me. And I hope</p> <p>4 I'm right.</p> <p>5 Do you know how many years of experience in</p> <p>6 the district you are going to need to have before you</p> <p>7 will become eligible for the Verona School District's</p> <p>8 retirement benefits?</p> <p>9 A. I think for me specifically, I'm not -- I'm not</p> <p>10 positive, but I believe it will have to be until I'm</p> <p>11 55. I'll have the years but I believe I also have to</p> <p>12 be 55.</p> <p>13 Q. All right. Let's go back and get some foundation.</p> <p>14 The retirement benefits that are applicable to you</p> <p>15 probably, correct me if I'm wrong, have two</p> <p>16 requirements, that you meet at the age of 55 and you</p> <p>17 have a certain number of years of experience, right?</p> <p>18 A. Right.</p> <p>19 Q. And I'm hearing you, I think we're communicating,</p> <p>20 you've got no concerns, you're going to meet that</p> <p>21 years of experience, it's just getting to age 55,</p> <p>22 right?</p> <p>23 A. Yes.</p> <p>24 Q. And if you don't mind me asking, how old are you?</p> <p>25 A. I'm 42.</p>	<p>1 A. No.</p> <p>2 Q. Okay. So why have you not sought other -- let's back</p> <p>3 up.</p> <p>4 You're making a claim in this case that</p> <p>5 you're not being paid enough money and you claim you</p> <p>6 should be paid commensurate with how the district has</p> <p>7 paid another male special education teacher named</p> <p>8 Isaiah Crowe, correct?</p> <p>9 A. Yes.</p> <p>10 Q. All right. So I understand you're not happy with the</p> <p>11 salary you had before you left for Germany, correct?</p> <p>12 A. Yes.</p> <p>13 Q. All right. Why have you not sought employment in</p> <p>14 other districts to obtain the salary that you believe</p> <p>15 you are entitled to?</p> <p>16 MS. HENRY: Objection, foundation. Go</p> <p>17 ahead.</p> <p>18 BY MS. LUBINSKY:</p> <p>19 Q. Go ahead.</p> <p>20 A. So when I first found out about the issues with</p> <p>21 Isaiah Crowe and him getting paid more, I felt like I</p> <p>22 did deserve to get paid as much as he did. And when</p> <p>23 that all happened, I did seek other employment</p> <p>24 through the Department of Defense where I do get with</p> <p>25 benefits, you know, essentially paid more.</p>
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<p>1 Q. So you've got, simple math, and assuming you get --</p> <p>2 well, you wouldn't need the credit from Germany</p> <p>3 because you've got so many years. So you've got</p> <p>4 about 13 more years of working before you can be</p> <p>5 eligible for those retirement benefits, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Now, here is my question. Assuming you come back,</p> <p>8 you work at Verona and you work until you're 55, and</p> <p>9 we know, we both know you're going to have way more</p> <p>10 years of experience than you probably need, you're</p> <p>11 going to get, if all of those hypotheticals are true,</p> <p>12 and you work through 55 and you decide to retire at</p> <p>13 that point, do you have a sense for what the</p> <p>14 retirement benefits are that you will receive?</p> <p>15 A. No, I don't.</p> <p>16 Q. That's a fair answer. Do you know if it's like a</p> <p>17 certain percentage of your salary or is it a lump sum</p> <p>18 every year or you literally just don't know?</p> <p>19 A. I literally just don't know.</p> <p>20 Q. That's okay. That's okay. Let me try it this way</p> <p>21 and I'll move off retirement.</p> <p>22 Is the fact that you have these retirement</p> <p>23 benefits, whatever they may be, something, a factor</p> <p>24 in your decision to stay at Verona for as long as you</p> <p>25 have?</p>	<p>1 Q. Okay. Let's explore that just a little bit.</p> <p>2 Approximately when did you learn that</p> <p>3 Isaiah Crowe was making more than you?</p> <p>4 A. Probably late 2019.</p> <p>5 Q. Do you recall how you came to learn that information?</p> <p>6 A. I had learned it through our region 6 director, Mandy</p> <p>7 Dorris.</p> <p>8 Q. So Mandy advised you that Isaiah Crowe was making</p> <p>9 more than you, correct, or words to that effect?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And then going back to your testimony,</p> <p>12 approximately when did you seek other employment</p> <p>13 after learning that information?</p> <p>14 A. Approximately I started November 2021.</p> <p>15 Q. You started your --</p> <p>16 A. Sorry, sorry, sorry.</p> <p>17 Q. That's okay.</p> <p>18 A. So it was 2021, so, yeah, November 2021 was when I</p> <p>19 began filling out the application for -- yeah.</p> <p>20 Q. Okay. So here's what I've got, and I'm just taking</p> <p>21 some notes here. You learned about Crowe's salary as</p> <p>22 compared to yours in late 2019. You did not seek</p> <p>23 employment elsewhere until approximately November of</p> <p>24 2021. Do I have that right?</p> <p>25 A. Yup.</p>

12 (Pages 42 - 45)

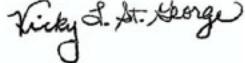
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<p>1 Q. Okay. And you filled out the application for the 2 Department of Defense, correct?</p> <p>3 A. Yes.</p> <p>4 Q. You obviously got the job. You're there. 5 Congratulations. And my only other follow-up 6 question is you said that you do make more with I 7 believe you said with benefits, or I didn't write 8 down your exact words but tell me about what you 9 meant by that.</p> <p>10 A. Living -- a benefit when living in Europe is that 11 you're -- you get a living stipend. So the living 12 stipend is on top of your salary.</p> <p>13 Q. Okay. And I'm not --</p> <p>14 A. So --</p> <p>15 Q. I'm sorry. Please continue. I apologize, Stacy. 16 A. So with the living stipend, the benefit is more.</p> <p>17 Q. Okay. Here is what I'm hearing you say. Combining 18 your salary and your living stipend, you have made 19 more in the years you've been there than you would 20 have made had you been -- had you continued on in 21 Verona for these past two years?</p> <p>22 A. Yes.</p> <p>23 Q. Do you know whether your salary plus your living 24 stipend combined is more or less than Isaiah Crowe 25 has made, or you're not sure?</p>	<p>1 when you were at Verona?</p> <p>2 A. No.</p> <p>3 Q. So do you know what population of students he serves?</p> <p>4 A. No.</p> <p>5 Q. You were not present during his negotiations 6 involving his salary with Jason Olson or HR staff, 7 correct?</p> <p>8 A. No. Correct.</p> <p>9 Q. So you do not know why Isaiah Crowe was placed where 10 he was on the salary schedule, correct?</p> <p>11 A. Yes.</p> <p>12 Q. Is it your position in this lawsuit that every -- let 13 me withdraw that question. I'm going to get to it 14 later.</p> <p>15 You have no basis from any source to 16 believe that Isaiah Crowe's salary was placed on the 17 salary -- that Isaiah Crowe was placed on the salary 18 schedule based on his sex, correct?</p> <p>19 A. Could you repeat that?</p> <p>20 MS. HENRY: Objection, foundation. Go 21 ahead, please.</p> <p>22 MS. LUBINSKY: I will rephrase it because 23 she asked me to rephrase it, so we'll start that one 24 over.</p> <p>25 BY MS. LUBINSKY:</p>
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<p>1 A. No, because the living stipend just goes towards your 2 living. So it doesn't -- it's not included within 3 your salary.</p> <p>4 Q. But it is a separate pot of money that you get, 5 correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Just like a salary here in Verona, right, is a 8 pot of money you get that you need to pay, among 9 other things, living expenses, right?</p> <p>10 A. Um-hum.</p> <p>11 Q. Is that a yes?</p> <p>12 A. Yes. Sorry.</p> <p>13 Q. No, that's okay. So I'm just trying to figure out, 14 and let me just be very direct, Stacy. 15 Are you claiming that you have made less 16 than Isaiah Crowe in the two years that you, and I 17 know it's been like a year-and-a-half, but in the 18 time since you've been at Germany, or you're just not 19 sure?</p> <p>20 A. I'm just not sure.</p> <p>21 Q. Okay. That's a fair answer. Once you learn in late 22 2019 that Isaiah Crowe was making more -- Strike 23 that. Let me back up. 24 Isaiah Crowe I'll represent to you works at 25 the high school. Did you ever work with him at all</p>	<p>1 Q. You have no independent knowledge to suggest or 2 support the accusation that the Verona Area School 3 District placed Isaiah Crowe on the salary schedule 4 based on his sex, correct?</p> <p>5 MS. HENRY: Object to the form.</p> <p>6 THE WITNESS: Yes.</p> <p>7 BY MS. LUBINSKY:</p> <p>8 Q. I want to talk about -- I'm going to go back to the 9 demand letter now. Technology, give me one moment. 10 Stacy, do you see the demand letter on your 11 screen?</p> <p>12 A. Yes.</p> <p>13 Q. And for the record, I previously only showed this to 14 the witness. I'm going to mark this as Tremaine 15 Exhibit 1. All right. 16 Stacy, I'd like to walk through with you 17 this letter if you wouldn't mind. We talked about 18 this before but to confirm, the letter is signed by 19 Elizabeth Fernandez, legal counsel, and she's 20 employed at or at the time worked at WEAC, do you see 21 that?</p> <p>22 A. Yes.</p> <p>23 Q. And was she legal counsel representing you at the 24 time of this letter?</p> <p>25 A. Yes.</p>

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<p>1 Q. Okay. She starts her letter, and for the record 2 only, I am not reading this letter verbatim, it 3 speaks for itself. I just want to go through some of 4 the points with you, Stacy. Do you see in the second 5 paragraph of the letter that she is addressing your 6 education, your certification and things of that 7 nature, right?</p> <p>8 A. Yes.</p> <p>9 Q. And we talked about all of that education earlier in 10 this deposition, correct?</p> <p>11 A. Yes.</p> <p>12 Q. I want to go to the next paragraph in her letter. It 13 says you have a teacher lifetime license for specific 14 learning disabilities, prekindergarten through grade 15 9.</p> <p>16 First of all, do you see that?</p> <p>17 A. Yes.</p> <p>18 Q. And is that, as you sit here today, is that your 19 license?</p> <p>20 A. Yes.</p> <p>21 Q. So to be clear, you are not licensed to teach beyond 22 grade 9, correct?</p> <p>23 A. Correct.</p> <p>24 Q. And by lifetime license, I think I know what that 25 means, but I'm going to get your understanding of</p>	<p>1 talks about the fact that you are both special 2 education teachers, you both have masters and 3 bachelors and that Crowe she says it appears 14 years 4 of experience and you have 16. Do you see where I 5 referenced that?</p> <p>6 A. Yes.</p> <p>7 Q. And I assume you would testify it's your view that 8 you have similar education and slightly more work 9 experience than Mr. Crowe, would that be fair?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Next paragraph of her letter talks about Mr. 12 Crowe's assignment being at the high school and that 13 your assignment is at the middle school, do you see 14 that?</p> <p>15 A. Yes.</p> <p>16 Q. And based on what you know, you would agree that's 17 true, that he was assigned to the high school and you 18 were assigned to the middle school?</p> <p>19 A. Yes.</p> <p>20 Q. And she talks about the district's job description 21 for special education teacher, not differentiating in 22 any fashion among grades. Do you believe that to be 23 true?</p> <p>24 A. Yes.</p> <p>25 Q. But you would acknowledge that you are not certified</p>
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<p>1 what -- what is a lifetime license?</p> <p>2 A. A lifetime license just means that I don't -- you 3 don't have to take additional credits, you don't have 4 to do any additional course work to keep your 5 education license going.</p> <p>6 Q. Okay. Got it. All right. And then still within 7 that same area of the letter, Ms. -- Attorney 8 Fernandez is talking about according to what DPI 9 says. And let's just assume she got it right, okay. 10 She says that Mr. Crowe has a teacher's lifetime 11 license for the following, and then she labels it 12 cross-categorical special education, early 13 adolescence-adolescence.</p> <p>14 First of all, do you see that on the 15 letter?</p> <p>16 A. Yes.</p> <p>17 Q. And that is a different licensure than you have, 18 correct?</p> <p>19 A. Yes.</p> <p>20 Q. And if you know, what does early 21 adolescence-adolescence, what does that translate in 22 terms of what grades Mr. Crowe can teach? And if you 23 don't know, I'll accept that you don't know.</p> <p>24 A. I don't know.</p> <p>25 Q. Okay. We're going to move on. Her next paragraph</p>	<p>1 to teach the grades that Mr. -- grade levels that Mr. 2 Crowe teaches assuming he teaches above 9th grade, 3 correct?</p> <p>4 A. Yes.</p> <p>5 Q. All right. I'm going on in the letter. At the top 6 of page 2 the letter indicates as follows "the 7 district and the district's board of education are 8 responsible for the discriminatory pay disparity." 9 Do you see where I read?</p> <p>10 A. Yes.</p> <p>11 Q. All right. And she goes on to talk about some facts 12 about where Mr. Crowe -- when Mr. Crowe was hired, 13 how much he was hired for and where he was placed. I 14 don't have questions on that.</p> <p>15 Next paragraph down indicates that Ms. 16 Tremain and Mr. Crowe perform equal work that 17 requires equal skill, effort and responsibility, do 18 you see that?</p> <p>19 A. Yes.</p> <p>20 Q. And do you agree with that?</p> <p>21 A. Yes.</p> <p>22 Q. How do you know that you perform equal work that 23 requires equal skill, effort and responsibility as 24 compared to Mr. Crowe if you don't know what he does?</p> <p>25 A. Well, we're both hired as special education teachers,</p>

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<p style="text-align: right;">Page 54</p> <p>1 and the special education teacher description is the 2 same for kindergarten through everything or through 3 the whole district. So the description is the same 4 of what a special education teacher's requirements or 5 job description is.</p> <p>6 Q. Is that the complete answer to my question, or is 7 there anything more you want to add?</p> <p>8 A. That's the complete answer.</p> <p>9 Q. Very good. I'll move on. And then the next 10 paragraph, next sentence, excuse me, says both, 11 meaning you and Mr. Crowe, have similar working 12 conditions and work in their positions full time. 13 What is your -- do you agree that you have 14 similar working conditions to Mr. Crowe?</p> <p>15 A. Yes.</p> <p>16 Q. And is the basis for that belief the same as your 17 basis for your belief that you performed equal work 18 requiring equal skill, effort and responsibility?</p> <p>19 A. Yes.</p> <p>20 Q. All right. And then next sentence talks about the 21 district's compensation of you at a salary less than 22 it says male counterpart but a salary less than Mr. 23 Crowe for equal work violates the Wisconsin Fair 24 Employment Act, do you see that?</p> <p>25 A. Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 A. Yes.</p> <p>2 Q. Okay. I'm going to stop sharing. One moment. Just 3 a few more questions, Stacy. 4 Have you quantified the difference between 5 your salary and Mr. Crowe's salary for the 2019-'20 6 or 2020-'21 school year?</p> <p>7 A. Have I quantified it? No.</p> <p>8 Q. Okay. Would you agree there is a significant teacher 9 shortage in the State of Wisconsin?</p> <p>10 MS. HENRY: Objection, foundation. Go 11 ahead.</p> <p>12 THE WITNESS: Currently?</p> <p>13 BY MS. LUBINSKY:</p> <p>14 Q. Yes.</p> <p>15 A. I don't know. I haven't been keeping up with the 16 teacher shortages in Wisconsin right now.</p> <p>17 Q. Okay. Let me try it better. 18 Before you left Germany, okay, so when you 19 were living in Wisconsin and obviously had worked in 20 the district for 20 -- or since 2003, did you become 21 aware, especially -- let me try -- let me start this 22 way. 23 At some time after Act 10 was passed, did 24 you become aware that there were certain teachers in 25 certain subject areas that were in demand in the</p>
<p style="text-align: right;">Page 55</p> <p>1 Q. And then the letter ends by a demand by, and I 2 understand this is a lawyer on your behalf, but a 3 demand on your behalf to pay back pay for the 4 differential between your salary and Mr. Crowe's, 5 right?</p> <p>6 A. Yes.</p> <p>7 Q. And a demand that your salary be raised immediately 8 to match that of Mr. Crowe, right?</p> <p>9 A. Yes.</p> <p>10 Q. And the letter ends please contact me with questions, 11 correct?</p> <p>12 A. Yes.</p> <p>13 Q. And you would agree this was a demand letter written 14 on your behalf for a monetary amount of back pay and 15 an immediate change of your salary to match Crowe's, 16 right?</p> <p>17 A. Yes.</p> <p>18 Q. You did not consider this letter to be a negotiation, 19 correct?</p> <p>20 A. Correct.</p> <p>21 Q. And what happened thereafter, and I'm not going to 22 worry about dates, but at some point after this 23 letter an Equal Rights Division discrimination 24 complaint was filed by Attorney Fernandez on behalf 25 of you and others, correct?</p>	<p style="text-align: right;">Page 57</p> <p>1 State of Wisconsin?</p> <p>2 MS. HENRY: Objection, foundation. Go 3 ahead.</p> <p>4 THE WITNESS: Yes.</p> <p>5 BY MS. LUBINSKY:</p> <p>6 Q. And how did you come to learn that, Stacy?</p> <p>7 A. Through my role on the negotiations committee.</p> <p>8 Q. Tell me what -- and that makes perfect sense to me. 9 So in your role on the negotiations committee you 10 learned that there are certain teaching areas that 11 are in demand, correct?</p> <p>12 A. Yes.</p> <p>13 Q. What areas, and by areas, I'm referring to things 14 like tech ed, math, English, special ed, health. 15 What areas did you come to learn in your role on the 16 negotiations committee were in demand in the State of 17 Wisconsin?</p> <p>18 A. The ones I recall were the special ed, school 19 psychologist and like a tech ed.</p> <p>20 Q. Does that complete what you can remember in that 21 regard?</p> <p>22 A. Yes.</p> <p>23 Q. And you came to learn in your role on the union 24 negotiations team or group that the district had 25 placed certain people on the salary schedule at a</p>

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<p>1 place higher than their experience level -- Strike 2 that. Let me start it this way.</p> <p>3 Are you aware of females in the Verona Area 4 School District who are placed on the salary schedule 5 at a place higher than their experience level would 6 otherwise indicate?</p> <p>7 A. No.</p> <p>8 Q. Are you aware of situations where females like Mr. 9 Crowe, females were hired higher than an existing 10 male teacher in whatever that role would be, could be 11 like a health teacher, a tech ed teacher, whatever 12 the position is?</p> <p>13 A. Could you clarify that question for me again?</p> <p>14 Q. Sure. Let me give you an example.</p> <p>15 Are you personally aware of situations 16 where a new teacher at Verona is -- who is a female 17 was placed on the salary schedule higher than an 18 existing male teacher who performs -- who has the 19 same job title?</p> <p>20 A. No.</p> <p>21 Q. Have you done any analysis at any time, and I 22 recognize you've been in Germany for two years so you 23 may not remember if you did, but did you ever look at 24 the salary schedule and figure out if there were in 25 fact females who were placed higher than their</p>	<p>1 placed on the salary schedule based on their sex? 2 MS. HENRY: Objection, vague.</p> <p>3 THE WITNESS: Can you repeat that?</p> <p>4 MS. HENRY: Go ahead.</p> <p>5 BY MS. LUBINSKY:</p> <p>6 Q. Go ahead, Stacy.</p> <p>7 A. Can you repeat it for me again?</p> <p>8 Q. Sure. Do you have personal knowledge that any 9 employee of the Verona Area School District was 10 placed on the salary schedule based on their sex?</p> <p>11 MS. HENRY: Objection, vague. Go ahead.</p> <p>12 THE WITNESS: No.</p> <p>13 MS. LUBINSKY: If I could take a two 14 minute break, I want to consult with my co-counsel 15 Rich and then I may be done. So Stacy, if you just 16 want to put me on mute or something for a minute, 17 I'm going to call Rich and then I may be done.</p> <p>18 (Recess taken.)</p> <p>19 MS. LUBINSKY: Stacy, I have no further 20 questions.</p> <p>21 MS. HENRY: And Stacy, I do not have any 22 questions, so you are done.</p> <p>23 (At 11:31 a.m., the deposition concluded.)</p> <p>24 * * *</p> <p>25 COURT REPORTER: Transcripts?</p>
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<p>1 experience level and as a result higher than male 2 counterparts based on similar experience?</p> <p>3 A. I did not do that independently. When I had first -- 4 no, I did not do that independently.</p> <p>5 Q. Okay. I asked you about Isaiah Crowe, and I want to 6 eliminate you being a witness to something else 7 that's at issue in the lawsuit so bear with me. I 8 don't think you know anything about this, but I've 9 got to ask.</p> <p>10 The district hired a guy by the name of 11 William Howlett in August of 2017 as a school 12 psychologist. Were you involved at all with respect 13 to Mr. Howlett's hiring?</p> <p>14 A. No.</p> <p>15 Q. Were you involved at all in the placement of Mr. 16 Howlett on the salary schedule?</p> <p>17 A. No.</p> <p>18 Q. Were you involved with any other school psychologist 19 who were claiming -- in your role as a union 20 representative, who were claiming that they should 21 have been paid what Will Howlett should have been 22 paid?</p> <p>23 A. No.</p> <p>24 Q. Okay. Do you have any personal knowledge that any 25 employee of the Verona Area School District was</p>	<p>1 MS. LUBINSKY: Yes.</p> <p>2 MS. HENRY: Let me check and get back to 3 you.</p> <p>4 MS. BANASZAK: We have a purchase order 5 for Veritext, so we can go ahead and order the 6 transcript.</p> <p>7 MS. HENRY: Then we'll get a copy with 8 regular delivery. Electronic. We'll reserve 9 signature.</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

<p>1 C E R T I F I C A T E</p> <p>2 STATE OF WISCONSIN)</p> <p>3) SS</p> <p>3 MILWAUKEE COUNTY)</p> <p>4 I, VICKY L. ST. GEORGE, Registered Merit</p> <p>5 Reporter and Notary Public in and for the State of</p> <p>6 Wisconsin, do hereby certify that the preceding deposition</p> <p>7 was recorded by me and reduced to writing under my</p> <p>8 personal direction.</p> <p>9 I further certify that said deposition was</p> <p>10 taken at The Witness's Residence, [REDACTED]</p> <p>11 on December 16, 2022, commencing at 10:00 a.m and</p> <p>12 concluding at 11:31 a.m.</p> <p>13 I further certify that I am not a relative or</p> <p>14 employee or attorney or counsel of any of the parties, or</p> <p>15 a relative or employee of such attorney or counsel, or</p> <p>16 financially interested directly or indirectly in this</p> <p>17 action.</p> <p>18 In witness whereof, I have hereunto set my hand</p> <p>19 and affixed my seal of office at Milwaukee, Wisconsin,</p> <p>20 this 21st day of December, 2022.</p> <p>21</p> <p>22 </p> <p>23 VICKY L. ST. GEORGE</p> <p>24 Notary Public in and for the</p> <p>25 State of Wisconsin</p> <p>25 Commission Expires 1/29/2025</p>	<p>Page 62</p> <p>1 US Equal Employment Opportunity Commission v. Verona Area School</p> <p>2 Stacy Tremaine (#5626961)</p> <p>3 E R R A T A S H E E T</p> <p>4 PAGE ____ LINE ____ CHANGE _____</p> <p>5 _____</p> <p>6 REASON _____</p> <p>7 PAGE ____ LINE ____ CHANGE _____</p> <p>8 _____</p> <p>9 REASON _____</p> <p>10 PAGE ____ LINE ____ CHANGE _____</p> <p>11 _____</p> <p>12 REASON _____</p> <p>13 PAGE ____ LINE ____ CHANGE _____</p> <p>14 _____</p> <p>15 REASON _____</p> <p>16 PAGE ____ LINE ____ CHANGE _____</p> <p>17 _____</p> <p>18 REASON _____</p> <p>19 PAGE ____ LINE ____ CHANGE _____</p> <p>20 _____</p> <p>21 REASON _____</p> <p>22</p> <p>23</p> <p>24 Stacy Tremaine Date</p> <p>25</p>
<p>1 Ann Henry, Esq.</p> <p>2 ann.henry@eeoc.gov</p> <p>3 December 30th, 2022</p> <p>4 RE:US Equal Employment Opportunity Commission v. Verona Area</p> <p>5 12/16/2022, Stacy Tremaine (#5626961)</p> <p>6 The above-referenced transcript is available for</p> <p>7 review.</p> <p>8 Within the applicable timeframe, the witness should</p> <p>9 read the testimony to verify its accuracy. If there are</p> <p>10 any changes, the witness should note those with the</p> <p>11 reason, on the attached Errata Sheet.</p> <p>12 The witness should sign the Acknowledgment of</p> <p>13 Deponent and Errata and return to the deposing attorney.</p> <p>14 Copies should be sent to all counsel, and to Veritext at</p> <p>15 (erratas-cs@veritext.com)</p> <p>16</p> <p>17 Return completed errata within 30 days from</p> <p>18 receipt of testimony.</p> <p>19 If the witness fails to do so within the time</p> <p>20 allotted, the transcript may be used as if signed.</p> <p>21</p> <p>22 Yours,</p> <p>23 Veritext Legal Solutions</p> <p>24</p> <p>25</p>	<p>Page 63</p> <p>1 US Equal Employment Opportunity Commission v. Verona Area School</p> <p>2 Stacy Tremaine (#5626961)</p> <p>3 ACKNOWLEDGEMENT OF DEPONENT</p> <p>4 I, Stacy Tremaine, do hereby declare that I</p> <p>5 have read the foregoing transcript, I have made any</p> <p>6 corrections, additions, or changes I deemed necessary as</p> <p>7 noted above to be appended hereto, and that the same is</p> <p>8 a true, correct and complete transcript of the testimony</p> <p>9 given by me.</p> <p>10</p> <p>11</p> <p>12 Stacy Tremaine Date</p> <p>13 *If notary is required</p> <p>14 SUBSCRIBED AND SWORN TO BEFORE ME THIS</p> <p>15 ____ DAY OF _____, 20 ____.</p> <p>16</p> <p>17</p> <p>18</p> <p>19 NOTARY PUBLIC</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
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[school - speed]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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